

EDWARD H. KUBO, JR. #2499
United States Attorney
District of Hawaii

FLORENCE T. NAKAKUNI #2286
Chief, Narcotics Section

BEVERLY WEE SAMESHIMA #2556
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Boulevard
Honolulu, Hawaii 96850
Telephone: (808) 541-2850
Facsimile: (808) 541-2958
E-mail: Beverly.Sameshima@usdoj.gov

Attorneys for Plaintiff
UNITED STATES OF AMERICA

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

2 SEP 10 2003
at 10 o'clock and 1 min M
WALTER A. Y. H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

CR 03-00452 HG

UNITED STATES OF AMERICA,)	Cr. No.
)	
Plaintiff,)	INDICTMENT
)	
vs.)	[21 U.S.C. §§ 863 and 846]
)	
TERRY WONG,	(01),)
UNI NAOMI NOGUCHI,)	
aka Lucy Noguchi,)	
aka Lucy Park,	(02),)
)	
Defendants.)	
)	

INDICTMENT

Count 1

The Grand Jury charges that:

During the period on or about August 1, 2003, up
through and including on or about August 6, 2003, in the District

of Hawaii, and elsewhere, Defendants TERRY WONG and UNI NAOMI NOGUCHI, did conspire with each other and with persons known and unknown to the Grand Jury, to knowingly, intentionally and unlawfully import into the United States drug paraphernalia, as that term is defined in Title 21, United States Code, Section 863(d), to wit: approximately 2,286 assorted metal and glass pipes.

In violation of 21 United States Code, Sections 863(a)(1), 863(b) and 846.

OVERT ACTS

In furtherance of and in order to accomplish the objects of this conspiracy, the Defendants and their co-conspirators performed overt acts in the District of Hawaii, and elsewhere, including but not limited to, the following:

1. In or around June, 2003, Defendants UNI NAOMI NOGUCHI and TERRY WONG ordered drug paraphernalia from New Delhi, India to be sent to them from New Delhi, India to Honolulu, Hawaii.

2. On or about August 6, 2003, Defendant TERRY WONG traveled to the U.S. Customs Office in Honolulu to obtain the parcel containing drug paraphernalia which had been sent from New Delhi, India to Honolulu, Hawaii.

Count 2

The Grand Jury further charges that:

In or around July 2003, and continuing up until August 6, 2003, Defendants TERRY WONG and UNI NAOMI NOGUCHI, in the District of Hawaii did knowingly, intentionally and unlawfully sell and offer for sale, drug paraphernalia, as that term is defined in Title 21, United States Code, Section 863(d).

In violation of 21 United States Code, Sections 863(a)(1) and 863(b).

Count 3

The Grand Jury further charges:

As a result of committing the offenses alleged in Counts 1 and 2 herein, Defendants TERRY WONG AND UNI NAOMI NOGUCHI shall forfeit to the United States, pursuant to 21 U.S.C. § 863(b), any and all drug paraphernalia involved in any violation of section 863(a):

Drug paraphernalia sold or imported as alleged in Counts 1 and 2.

If any of the above-described forfeitable property, as a result of any act or omission of the Defendants -

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third person;
3. has been placed beyond the jurisdiction of the court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) to seek forfeiture of any other property of the Defendant up to the value of the above forfeitable property.

All in violation of Title 21, United States Code, Section 863(c).

DATED: September 10, 2003, Honolulu, Hawaii.

A TRUE BILL

151

FOREPERSON, GRAND JURY

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii

Florence T Nakakuni

FLORENCE T. NAKAKUNI
Chief, Narcotics Section

Beverly W. Sameshima

BEVERLY WEE SAMESHIMA
Assistant U.S. Attorney

United States v. Terry Wong, et.al
Cr. No.